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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. *2012-17*

13 **JANIE LOUISE GRAHAM, a.k.a. JANIE**
14 **LOUISE WOOD GRAHAM**
15 **465 Transom Lane**
16 **Foster City, CA 94404**
17 **Registered Nurse License No. 547233**

A C C U S A T I O N

Respondent.

18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
21 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
22 Consumer Affairs.

23 2. On or about August 25, 1998, the Board of Registered Nursing issued Registered
24 Nurse License Number 547233 to Janie Louise Graham, also known as Janie Louise Wood
25 Graham (Respondent). The Registered Nurse License expired on February 10, 2006, and has not
26 been renewed.

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6. Section 118, subdivision (b), of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

7. Section 2761 of the Code states:

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1 Arkansas Board identifying the medication, dosage and the date it was prescribed; (12) submit a
2 quarterly personal report to the Arkansas Board; and (13) obey all federal, state, and local laws,
3 and all rules governing the practice of nursing.

4 10. The underlying conduct supporting the Arkansas Board's disciplinary action is that
5 on or about November 16, 2004, employees of Saint Mary's Hospital in Rogers, Arkansas,
6 reported that Respondent was behaving erratically and that she smelled of alcohol. Respondent's
7 subsequent for-cause drug screen tested positive for alcohol. Respondent's employment with
8 Saint Mary's Hospital was terminated.

9 PRAYER

10 WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this
11 Accusation, and that following the hearing, the Board of Registered Nursing issue a decision:

12 1. Revoking or suspending Registered Nurse License Number 547233, issued to Janie
13 Louise Graham, also known as Janie Louise Wood Graham;

14 2. Ordering Janie Louise Graham, also known as Janie Louise Wood Graham to pay the
15 Board of Registered Nursing the reasonable costs of the investigation and enforcement of this
16 case, pursuant to Business and Professions Code section 125.3;

17 3. Taking such other and further action as deemed necessary and proper.
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20 DATED: July 12, 2011

21 Louise R. Bailey
22 LOUISE R. BAILEY, M.ED., RN
23 Executive Officer
24 Board of Registered Nursing
25 Department of Consumer Affairs
26 State of California
27 Complainant
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